

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF GEORGIA

EDWARD HANSON,

Plaintiff,

- against -

GA DREAMWORKS REALTY, LLC

Defendant.

Docket No. 5:20-cv-00104

JURY TRIAL DEMANDED

**COMPLAINT**

Plaintiff Edward Hanson (“Hanson” or “Plaintiff”) by and through his undersigned counsel, as and for his Complaint against Defendant GA Dreamworks Realty, LLC (“GA Dreamworks Realty” or “Defendant”) hereby alleges as follows:

**NATURE OF THE ACTION**

1. This is an action for copyright infringement under Section 501 of the Copyright Act. This action arises out of Defendant’s unauthorized reproduction and public display of copyrighted photographs of a home, owned and registered by Hanson, a professional photographer. Accordingly, Hanson seeks monetary relief under the Copyright Act of the United States, as amended, 17 U.S.C. § 101 *et seq.*

**JURISDICTION AND VENUE**

2. This claim arises under the Copyright Act, 17 U.S.C. § 101 *et seq.*, and this Court has subject matter jurisdiction over this action pursuant to 28 U.S.C. §§ 1331 and 1338(a).

3. Upon information and belief, this Court has personal jurisdiction over Defendant because Defendant resides and/or transacts business in Georgia and is registered with the Georgia Department of State Division of Corporations.

4. Venue is proper in this District pursuant to 28 U.S.C. § 1391(b).

### **PARTIES**

5. Hanson is a professional photographer in the business of licensing his photographs for a fee having a usual place of business at 23939 Crescent Parke Court, Fernandina Beach, Florida 32034.

6. Upon information and belief, GA Dreamworks Realty is a domestic limited liability company duly organized and existing under the laws of the State of Georgia, with a place of business at 1247 Golden Isles W, Baxley, GA 31513. Upon information and belief, GA Dreamworks Realty is registered with the Georgia Corporations Divisions to transact business in Georgia. At all times material hereto, GA Dreamworks Realty has listed a home at 84 Beecher Road, Hazlehurst, GA 31539 on numerous listing websites (the “Websites”).

### **STATEMENT OF FACTS**

#### **A. Background and Plaintiff’s Ownership of the Photographs**

7. Hanson photographed a home at 84 Beecher Road, Hazlehurst, GA 31539 (the “Photographs”). A true and correct copy of the Photographs are attached hereto as Exhibit A.

8. Hanson is the author of the Photographs and has at all times been the sole owner of all right, title and interest in and to the Photographs, including the copyright thereto.

9. The Photographs were registered with United States Copyright Office and were given Copyright Registration Number VA 2-171-359.

#### **B. Defendant’s Infringing Activities**

10. GA Dreamworks Realty ran the Photographs on the Websites as a listing to sell the home at 84 Beecher Road, Hazlehurst, GA 31539. Screenshots of the Photographs on the Websites are attached hereto as Exhibit B.

11. GA Dreamworks Realty did not license the Photographs from Plaintiff for its listings on the Websites, nor did GA Dreamworks Realty have Plaintiff's permission or consent to publish the Photographs on its listings on the Websites.

**CLAIM FOR RELIEF**  
**(COPYRIGHT INFRINGEMENT AGAINST DEFENDANT)**  
**(17 U.S.C. §§ 106, 501)**

12. Plaintiff incorporates by reference each and every allegation contained in Paragraphs 1-11 above.

13. GA Dreamworks Realty infringed Plaintiff's copyright in the Photographs by reproducing and publicly displaying the Photographs on the listings on the Websites. GA Dreamworks Realty is not, and has never been, licensed or otherwise authorized to reproduce, publically display, distribute and/or use the Photographs.

14. The acts of Defendant complained of herein constitute infringement of Plaintiff's copyright and exclusive rights under copyright in violation of Sections 106 and 501 of the Copyright Act, 17 U.S.C. §§ 106 and 501.

15. Upon information and belief, the foregoing acts of infringement by GA Dreamworks Realty have been willful, intentional, and purposeful, in disregard of and indifference to Plaintiff's rights.

16. As a direct and proximate cause of the infringement by the Defendant of Plaintiff's copyright and exclusive rights under copyright, Plaintiff is entitled to damages and Defendant's profits pursuant to 17 U.S.C. § 504(b) for the infringement.

### **PRAYER FOR RELIEF**

WHEREFORE, Plaintiff respectfully requests judgment as follows:

1. That Defendant GA Dreamworks Realty be adjudged to have infringed upon Plaintiff's copyrights in the Photographs in violation of 17 U.S.C §§ 106 and 501;
2. That Plaintiff be awarded Plaintiff's actual damages and Defendant's profits, gains or advantages of any kind attributable to Defendant's infringement of Plaintiff's Photographs;
3. That Defendant be required to account for all profits, income, receipts, or other benefits derived by Defendant as a result of its unlawful conduct;
4. That Plaintiff be awarded punitive damages for copyright infringement;
5. That Plaintiff be awarded attorney's fees and costs;
6. That Plaintiff be awarded pre-judgment interest; and
7. Such other and further relief as the Court may deem just and proper.

### **DEMAND FOR JURY TRIAL**

Plaintiff hereby demands a trial by jury on all issues so triable in accordance with Federal Rule of Civil Procedure 38(b).

Dated: Valley Stream, New York  
March 16, 2020

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